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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MARIA JIMENEZ,

Plaintiff,

vs.

GEICO GENERAL INSURANCE
COMPANY, an entity licensed to do business
in the State of Nevada; DOES I through V; and
BUSINESS ENTITIES VI through X,
inclusive,

Defendants.

CASE NO.: 2:19-cv-00984-APG-VCF

**STIPULATION AND ORDER TO
EXTEND THE PRE-TRIAL ORDER
DEADLINE (THIRD REQUEST)**

Plaintiff Maria Jimenez ("Plaintiff"), by and through her attorneys of record of the law firm Greenman Goldberg Raby & Martinez, and Defendant GEICO General Insurance Company ("GEICO"), by and through its attorneys of record of the law firm McCormick, Barstow, Sheppard, Wayte, & Carruth LLP, hereby file this Stipulation and Order to Extend the Pre-Trial Order Deadline (Third Request), specifically seeking to extend the deadline by 90 days.



LAW FIRM
INJURY ATTORNEYS

1 **IT IS HEREBY STIPULATED AND AGREED** between the parties to extend the
 2 joint pre-trial order deadline of December 8, 2020. In accordance with Local Rule 26-4, the parties
 3 state as follows:

4 **I. DISCOVERY COMPLETED BY THE PARTIES:**

5 The parties have served their initial disclosures. Both parties have propounded and answered
 6 written discovery. Plaintiff's deposition testimony was provided on February 6, 2020.

7 **II. DISCOVERY WHICH REMAINS TO BE COMPLETED:**

8 For all intents and purposes, discovery has concluded, and the parties merely seek to
 9 extend deadline to submit the joint pre-trial order.

10 As noted above, the parties have been working diligently throughout the discovery
 11 process and discovery has effectively concluded but for the joint pre-trial order. The parties
 12 now seek to submit this matter to private mediation in an effort to reach a settlement. However,
 13 in light of the recent COVID-19 pandemic, scheduling has become more tenuous. The parties
 14 seek to have the pre-trial order deadline stayed until such time as a mediation is able to
 15 proceed.

16 **III. GOOD CAUSE EXISTS TO GRANT THE REQUESTED EXTENSION**

17 As stated above, there have been certain unforeseeable and unavoidable obstacles with
 18 calendaring presented by the onset of the COVID-19 pandemic and both the federal and state
 19 governments declaring a state of emergency. However, the parties are of the position that a 90-
 20 day extension of the joint pre-trial order

21 The parties request that the pertinent discovery deadlines set forth in the Court's
 22 Scheduling Order be continued ninety (90) days, as follows:

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A. PRETRIAL ORDER: Unless otherwise stated herein, and the Court so orders, the joint pretrial order shall be filed ninety (90) days from its current deadline of December 8, 2020, but not later than March 8, 2021.

DATED this 11th day of December, 2020.

GREENMAN GOLDBERG RABY & MARTINEZ

/s/ Taylor J. Smith

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2770 S. Maryland Pkwy, Ste. 100

Las Vegas, NV 89109

DATED this 11th day of December, 2020.

MCCORMICK, BARSTOW, SHEPPARD,

WAYTE & CARRUTH LLP

/s/ Jonathan W. Carlson

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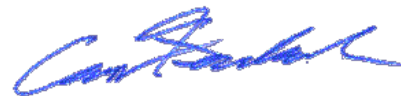
Las Vegas, Nevada 89118

ORDER

IT IS HEREBY ORDERED that the Joint Pretrial Order must be filed by March 8, 2021. If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

IT IS SO ORDERED:

DATED this 11th day of December, 2020



UNITED STATES MAGISTRATE JUDGE



CERTIFICATE OF SERVICE

Pursuant to FRCP 5, I certify that I am an employee of GREENMAN, GOLDBERG, RABY & MARTINEZ, and that on the 11th day of December, 2020, I caused the foregoing document, entitled **STIPULATION AND ORDER TO EXTEND THE PRE-TRIAL ORDER DEADLINE (THIRD REQUEST)** to be served via electronic service and/or US Mail upon all parties involved in this litigation.

/s/ Michael Madden

An Employee of GREENMAN, GOLDBERG,
RABY & MARTINEZ



LAW FIRM
INJURY ATTORNEYS